

AUSA: MJE

County: Douglas

State of Washington )

:ss

County of Douglas )

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Feb 10, 2023**

SEAN F. MCAVOY, CLERK

*In re Affidavit in Support of a Criminal Complaint and Arrest Warrant charging **Shawn Drummond** with Possession with Intent to Distribute Fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C)*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kenneth West, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint seeking the arrest of Shawn DRUMMOND for violating 21 U.S.C. § 841(a)(1), (b)(1)(C), Possession with Intent to Distribute Fentanyl. Based on my training and experience and the facts as set forth in this affidavit, I submit there is probable cause to believe that DRUMMOND has committed this federal criminal law violation.

2. I am a Special Agent with the U.S Department of Homeland Security Investigations (HSI). I have been employed as a Special Agent since April 2003. Prior to becoming a Special Agent with HSI, I was a commissioned police officer in Washington State for 6 years. I am currently assigned to the Seattle Division, Wenatchee Office of Investigations. I am responsible for investigating violations of federal law to include violations of the Controlled Substance Act, as well as firearms and Immigration offenses. I have received both state and

Affidavit of Special Agent West (23-mj-00052-JAG) - 1

federal training on the aforementioned criminal offenses, to include a number of post academy training relating to narcotics smuggling/trafficking, money laundering, illegal firearms possession, street gang investigations, identity theft and document fraud. I have been assigned duties which have included and involved, but were not limited to, debriefing defendants, witnesses, informants, investigating the possession and distribution of substances listed within the Controlled Substance Act, executing search/arrest warrants involving immigration, firearms, and drug offenses, gathering drug and non-drug evidence, gathering evidence relating to drug smuggling, money laundering and possession of firearms. Additionally, I have conducted numerous narcotics investigations pursuant to fentanyl possession & distribution that has attributed to knowledge of appearance, stamping, distribution weights, slang references and pricing.

3. Based on my training and experience, I know it is a violation of federal law for any person to possess a controlled substance with the intent to distribute the controlled substance to another person. I also know that fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide) is a controlled substance.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other Special Agents, Task Force Officers, other law enforcement officers from various agencies, and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **PROBABLE CAUSE**

5. On December 9, 2022, DRUMMOND was pulled over in East Wenatchee,  
Affidavit of Special Agent West (23-mj-00052-JAG) - 2

Washington by Columbia River Drug Task Force (CRDTF) Agents after CRDTF Agents observed him leaving his residence at 636 N. Grover Place in East Wenatchee. DRUMMOND was driving a black Dodge Challenger (WA. License CDY4763), which DRUMMOND is the registered owner of. DRUMMOND was the sole occupant of the vehicle. Agents with the CRDTF had developed probable cause to arrest DRUMMOND for Possession of Controlled Substance with Intent to Deliver (Fentanyl). In addition to probable cause for arrest of DRUMMOND, CRDTF Detective Sund had previously obtained a search warrant for DRUMMOND's residence on December 8, 2022, which was yet to be executed.

6. The search warrant obtained on December 8, 2022, was pursuant to the ongoing narcotics investigation of DRUMMOND, which included the search of his residence, 636 N. Grover Place, and vehicles on the property belonging to DRUMMOND to include his black Dodge Challenger, WA license CDY4763. While surveilling DRUMMOND's residence, a CRDTF detective observed a male who matched the physical description of DRUMMOND put two bags in the trunk of the Dodge Challenger. The male was also observed accessing the front passenger seat area. The detective then observed the male get into the Challenger, back up, and leave the residence.

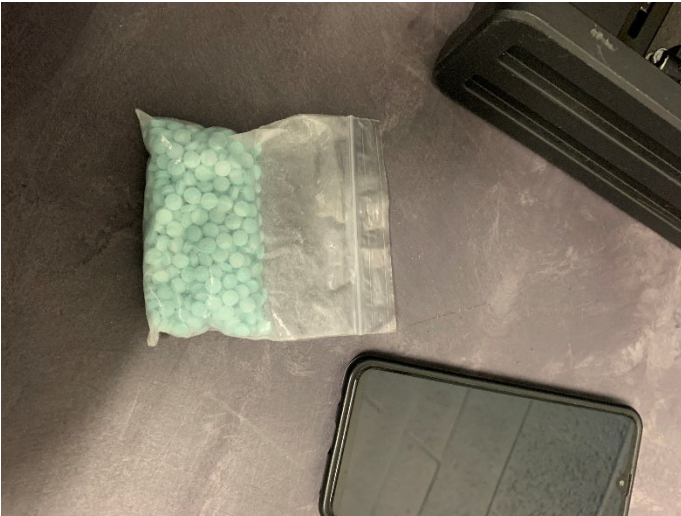
7. Since DRUMMOND's vehicle – the black Dodge Challenger – had left the 636 N. Grover Place, property on December 9, 2022, prior to the CRDTF executing the search warrant at DRUMMOND's residence, it was decided to obtain an additional search warrant to search DRUMMOND's black Dodge Challenger. CRDTF Sund obtained a search warrant for DRUMMOND's Dodge Challenger.

8. On the evening of December 13, 2022, CRDTF and Homeland Security  
Affidavit of Special Agent West (23-mj-00052-JAG) - 3

Investigations (HSI), executed the search warrant on DRUMMOND's black Dodge Challenger at the Wenatchee Police Department evidence garage. Within the trunk of the vehicle, Agents discovered two backpacks along with a small black "Sentry Safe." The safe is depicted below:



When opened, the safe contained a clear plastic baggy containing blue pills as well as a substantial amount of U.S. Currency. The contents of the safe as well as the baggie of blue pills are depicted below:



As described above, your affiant has become familiar with the appearance of how fentanyl illicitly manifests itself in the community – in the form of small, round, blue pills manufactured to appear similar to prescription pain medication such as Oxycodone or Percocet. When your affiant examined the pills seized from DRUMMOND's vehicle, your affiant recognized the pills as appearing consistent to pills containing fentanyl, or "blues". The pills were later weighed by the CRDTF and found to be 55.9 grams, which your affiant also knows to be consistent with approximately 500 pills. Based on training and experience, your affiant is aware that possession of approximately 500 pills, in close proximity with a substantial amount of U.S. Currency, is conduct associated with distributing the pills, as opposed to possessing the pills for personal use.

9. On January 24, 2023, HSI SA West re-examined these pills that were in CRDTF held evidence. SA West could see these pills have M-30 stamped on them. SA West through training and previous experience knew pills stamped with M-30 are consistent with counterfeit pills that contain fentanyl

Affidavit of Special Agent West (23-mj-00052-JAG) - 5

10. Based on the foregoing, I submit that there is probable cause to believe that on or about December 9, 2022, DRUMMOND committed the offenses of Possession with Intent to Distribute Fentanyl, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

Respectfully submitted,

*Kenneth West*

Kenneth West, Special Agent  
Homeland Security Investigations

Sworn to telephonically and signed electronically on this 10<sup>TH</sup> day of February 2023.



*James A. Goeke*

James A. Goeke  
United States Magistrate Judge